

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In Re:)	Chapter 11
)	
W. R. Grace & Co., et al. ¹ ,)	Case No. 01-01139 (JKF)
)	Jointly Administered
Debtors.)	
)	Re: Docket 9315
)	
)	Claimants: All Speights & Runyan Claimants

**SUPPLEMENTAL RESPONSE OF SPEIGHTS & RUNYAN
ON BEHALF OF ALL SPEIGHTS & RUNYAN CLAIMANTS SUBJECT TO
DEBTORS' FIFTEENTH OMNIBUS OBJECTION (SUBSTANTIVE)**

Speights & Runyan, on behalf of Anderson Memorial Hospital, the Board of Regents for the University of California, the California State University System, Pacific Freeholds and all other claimants, has filed or is filing individual responses to the Debtors' Fifteenth Omnibus Objections. Speights & Runyan respectfully submits this supplemental response on behalf of all claimants on whose behalf it has filed claims:

¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-I Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgracc, Inc., Coalgracc II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp, Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B 11 Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Ins., MICA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Curving, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

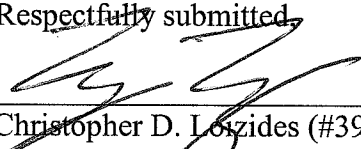
1. To the extent any Speights & Runyan claimant has, by inadvertence, technical, procedural or other reason failed to specifically address an objection raised by the Debtors' Fifteenth Omnibus Objection, the claimant denies that the objection is sufficient grounds to dismiss its claim and that the Debtors have failed to make the requisite showing in support.

2. Each Speights & Runyan claimant incorporates the applicable responses of all other property damage claimants.

3. Each Speights & Runyan claimant who is a member of the certified or putative class action styled Anderson Memorial Hospital v. W. R. Grace & Co., 92-CP-25-279 (Ct. Com. Pls., Hampton County, SC), asserts that any applicable statute of limitations or statute of repose was tolled as of the date of filing of the original complaint in Anderson. See, American Pipe & Const. v. Utah, 414 U.S. 538, 94 S.Ct. 756, 38 L.Ed.2d 713 (1974); Crown, Cork & Seal Co. v. Parker, 462 U.S. 345, 103 S.Ct. 2392, 76 L.Ed.2d 628 (1983).

Respectfully submitted,

Dated: October 24, 2005



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